

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

**CURLING PLAINTIFFS' NOTICE OF FILING LIST OF DISCOVERY TO
COMPLETE BEFORE SUMMARY JUDGMENT OR TRIAL**

Pursuant to this Court's request (June 7, 2022 Tr. at 63:1-5), Curling Plaintiffs hereby list the remaining discovery to be completed before summary judgment briefing or trial:

1. Complete discovery regarding potential unauthorized access to Georgia county election equipment and data;
2. Complete discovery regarding State investigations concerning election security issues, including third-party subpoenas and Rule 30(b)(6) deposition of the Secretary of State's Office; and
3. Complete depositions of Defendants Ed Lindsey & Jan Johnston.

Curling Plaintiffs understand that State Defendants will not offer testimony in this case beyond that already in the record and are content with the scope of the

record as it stands. (Dkt. 1340 at 7; Dkt. 1351; June 7 Tr. at 41:9-14.) Given State Defendants acknowledge they are bound by the scope and substance of the testimony provided by their Rule 30(b)(6) deponents and by their responses to written discovery requests, Curling Plaintiffs will forgo supplemental Rule 30(b)(6) deposition testimony from the Secretary of State's Office except as indicated above in No. 2. Curling Plaintiffs reserve the right to hold State Defendants to this limitation on evidence and arguments in this case or to seek discovery later should the Court allow State Defendants to exceed this limitation to some extent.

Dated: June 15, 2022

Respectfully submitted,

/s/ Mary G. Kaiser

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CERTIFICATE OF COMPLIANCE

Pursuant to LR 7.1(D), I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ Mary G. Kaiser
Mary G. Kaiser

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CERTIFICATE OF SERVICE

I hereby certify that on June 15, 2022, a copy of the foregoing **CURLING PLAINTIFFS' NOTICE OF FILING LIST OF DISCOVERY TO COMPLETE BEFORE SUMMARY JUDGMENT OR TRIAL** was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to all attorneys of record.

/s/ Mary G. Kaiser
Mary G. Kaiser